

# EXHIBIT E

**DEFENDANT/COUNTERCLAIMANT STRATEGIC VISION US, LLC'S  
DEPOSITION DESIGNATIONS**

**Yvette Wang**  
January 31, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
4:25	5:9				
6:2	6:8				
7:20	7:23				
8:16	11:15				
11:19	12:11				
12:19	13:2				
13:15	13:21				
13:25	13:25				
14:8	14:25				
15:4	15:21				
16:11	17:25				
18:6	19:2				
19:20	20:14				
22:12	22:18				
23:3	24:5				
24:9	24:14				
25:23	26:7				
26:19	27:5				
27:8	28:20				
28:23	28:24				
29:3	29:4				

**Yvette Wang (continued)**

January 31, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
29:7	31:14				
31:24	32:15				
32:20	33:11				
33:14	34:3				
34:13	35:4				
35:7	35:11				
35:15	35:16				
35:20	35:23				
36:2	36:4				
36:7	36:15	106	36:16	36:18	Undue prejudice from a witness whose basis for knowing Guo's membership or lack of membership in the Chinese Communist Party has not been established; lack of foundation; improper opinion testimony by witness that Guo is not a member of the CCP.
36:23	37:3	402; 403			
37:6	37:10	402; 403			
37:13	38:10				
39:21	40:3				
40:6	41:6				
41:9	41:9				

42:24	43:15	106	43:16	44:23	Hearsay (see 44:4-6), lack of foundation, the witness lacks personal knowledge to testify that there was a loan agreement between ACA and Eastern Profit. Wang did not sign the purported loan agreement, and testified that she had not seen a copy by the time of her deposition. The witness knew no details of the loan.
44:24	45:16				
45:21	46:7				
46:10	47:16				
47:20	47:21				

## Yvette Wang (continued)

Strategic Designations		Eastern Objections	Eastern Counter-Designations		Strategic Objections to Eastern Counter-Designations
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
51:6	52:18	106	52:19	53:13	52:19-24: the witness asks that the question be rephrased and the indicated lines are irrelevant and confusing.
53:14	54:7	106	54:08	55:04	
55:5	58:10				
58:13	60:4				
61:2	61:9				
61:17	63:5	106	63:08	63:16	Hearsay (see 44:4-6), lack of foundation, the witness lacks personal knowledge to testify about ACA's intentions for sending the two wires: "I was not involved in that instruction communication." Misleading, confusing to the trier of fact, incomplete factual record in that ACA evaded giving discovery in the case. There is no testimony from ACA in the case. There was no production of any other discovery by ACA in the case.
63:21	65:18				
65:24	66:2				
66:5	67:9				
68:24	72:14	106	72:15	73:21	Hearsay (see 72:15-16), misleading, confusing to the trier of fact, prejudicial, and the witness gives improper summary opinion testimony about Strategic's work under the Research Agreement as being "garbage," "nonsense," and "Russian language stuff." Regarding this subject, the witness later admits she is testifying about something

					without seeing a document related to the testimony (143:20-21) and then cautions that she is testifying “from memory” and “all based on my memory” when her memory is “really very blurry.” (146:11-12)
77:18	77:20				
77:23	78:18	106	79:25	81:06	Confusing, vague, lacking in relevance. The witness does not answer the direct question at 80:16-18. At most, the witness indicates the deliverable would be “valuable information” but gives no detail and does not indicate the form or substance of the reports called for by the Research Agreement.
83:17	84:5				
87:6	87:22				
89:2	90:2				
90:5	91:6		90:03	90:04	
91:23	92:8	402; 403			
92:11	92:18	402; 403			
96:9	97:11				
101:4	101:5				
101:11	101:12				

## Yvette Wang (continued)

Strategic Designations		Eastern Objections	Eastern Counter-Designations		Strategic Objections to Eastern Counter-Designations
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
102:21	103:7				
104:6	104:8	106	104:09	104:22	104:21-22 in conjunction with 105:1-11 are objectionable as vague, confusing, based on the witness's admitted lack of personal knowledge about Lianchao's involvement, the only substantive testimony is based on hearsay "I heard this Mr. Han." The witness does not even identify who she heard this information from.
104:23	104:25	106	105:01	105:11	104:21-22 in conjunction with 105:1-11 are objectionable as vague, confusing, based on the witness's admitted lack of personal knowledge about Lianchao's involvement, the only substantive testimony is based on hearsay "I heard this Mr. Han." The witness does not even identify who she heard this information from.
105:12	105:16				
106:9	107:3	106	107:04	107:12	The testimony is based on hearsay and speculation ("I don't know" and "my guess"). The witness lacks personal knowledge for the testimony.
107:13	107:20				
107:24	108:3				
108:6	108:15				
109:13	109:14	106	109:23	110:05	Confusing to the trier of fact, lacking in personal knowledge, hearsay. The witness admits she doesn't know who wrote the

					message being discussed, and her testimony is based on speculation.
109:16	109:22				
113:7	113:18	602; 801/802; Parol			
113:21	114:3	602; 801/802; Parol			
114:24	116:21				
117:12	117:15				
117:22	120:2				
124:25	125:23				
126:2	126:6				
130:18	130:24	402; 403			
134:19	136:21				
136:24	137:14				
137:17	137:25				



January 31, 2019  
Yvette Wang (continued)

Strategic Designations		Eastern Objections	Eastern Counter-Designations		Strategic Objections to Eastern Counter-Designations
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
138:19	140:17				
140:20	140:22				
140:25	141:13				
141:16	141:19	106	142:10	144:13	Hearsay and no exception applies. Further, the witness admits she is testifying about something without seeing a document related to the testimony (143:20-21) and later cautions that she is testifying “from memory” and “all based on my memory” when her memory is “really very blurry.” (146:11-12)
142:2	142:6				
142:8	142:9				
144:14	144:17	106	144:18	148:02	144:18-21 was withdrawn by the examiner when the witness did not understand the question and it should not be designated. The testimony lacks personal knowledge in that the witness admits she is testifying about something without seeing a document related to the testimony (143:20-21) and later cautions that she is testifying “from memory” and “all based on my memory” when her memory is “really very blurry.” (146:11-12) The testimony is largely based on hearsay “both were repeatedly apologized, saying they ...”
148:3	148:8				
151:2	151:4				

151:7	153:24				
154:6	154:10				
154:13	154:23				
154:25	155:2				
155:20	156:4	106	156:05	156:08	
157:7	157:21				
157:24	157:24				
158:6	158:9				
158:20	159:23				
160:2	161:17				
162:14	163:24				
164:12	164:18				

**Yvette Wang (continued)**  
January 31, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u><b>Beginning</b></u>	<u><b>Ending</b></u>		<u><b>Beginning</b></u>	<u><b>Ending</b></u>	
167:8	167:19				
168:3	170:22				
170:25	171:5				
173:22	173:25				
174:3	174:3				
174:5	177:5	106	177:06	177:14	Improperly contains an objection in violation of Rules 401-03 and 611
177:15	178:6				
179:7	183:17	402; 403			
183:20	185:7	402; 403			
185:18	185:25	402; 403			
187:2	187:6	402; 403			
188:24	189:5	402; 403			
191:23	192:3	402; 403			
194:20	196:7	402; 403			
196:10	198:7	402; 403			
199:9	200:6	106	198:08	199:08	Lacking in foundation and personal knowledge, the witness did not author the statement and attributed it to being “drafted by lawyer.” The witness then disclaims her ability to answer the question: “English is not my first language...I’m trying to understand.” She also says “I don’t understand this statement. Can you please help me?” The witness does not directly answer whether the alleged representation was actually made by Strategic. This creates

					confusion of issues and is prejudicial to Strategic.
200:10	201:21				
202:3	202:10				
202:14	203:9				
203:11	203:15				
206:13	206:20				

**Yvette Wang (continued)**  
January 31, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
208:20	209:13	106	207:25	208:05	Irrelevant, confusing, prejudicial to Strategic. The witness does not answer the question as posed, leading to the examiner to indicate that the answer was misplaced. The focused testimony is below but not cited by Eastern. (208:20-209:13)
213:10	213:17				
214:15	214:16				
214:19	215:20				
216:19	216:21				
217:4	217:25	106	218:01	220:17	Lack of foundation, lack of personal knowledge, confusion of issues in that the witness admits she does not know the subject of the document, stating twice “I don’t know” and “I don’t remember” the individual. The witness, in this deposition at least, testified that Guo, not the witness, prepared the list of subjects under the Research Agreement, and the witness testified that he gave the list to her (214:15-24)
230:11	230:15				
231:3	232:14				
235:3	235:5				
235:22	238:9				
239:21	239:24				
256:3	256:22	402; 403			
256:25	257:5	402; 403			

258:5	259:13				
259:19	260:8	402; 403			
260:11	261:6	402; 403			
262:10	262:15	402; 403			
262:18	262:18	402; 403			
263:8	264:7				
264:9	264:22				
264:24	265:3				

**Yvette Wang (continued)**

January 31, 2019

[illegible]

**Guo Wengui**  
August 2, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
5:9	5:12				
15:9	15:10	402, 403			
15:13	15:13	402, 403			
17:24	18:13	402, 403			
21:11	21:12	402, 403			
21:15	21:15	402, 403			
22:16	22:18	402, 403			
27:5	27:7				
27:16	27:17				
30:19	31:3	106	31:5	31:11	Hearsay without an applicable exception. Guo's initial statement regarding Wang's membership in the CCP is an admission of a party opponent under Rule 801(d)(2)
31:24	32:11	106	31:14	31:23	Hearsay without an applicable exception. Guo's initial statement regarding Wang's membership in the CCP is an admission of a party opponent under Rule 801(d)(2)
32:15	32:17	106	32:12	32:12	
33:6	33:12				
35:18	36:4				
38:3	38:11				
39:9	39:11				
39:15	39:24				



40:4	40:6	106	40:8 40:15	40:13 40:25	Confusion of issues, given that Wang testified Guo compiled the names or had them compiled. Cites 40:11, which was stricken by the examiner. 40:19-25 is nonresponsive, creating confusion of the issues and presenting irrelevant testimony. The question was a yes-or-no question not tied to “reports.” Guo did not answer the question, and provides testimony prejudicial to Strategic that is misleading.
41:24	44:23				
45:3	45:6				
45:10	46:16				

**Guo Wengui (continued)**

August 2, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
47:25	48:4				
49:6	49:8				
49:17	49:22				
50:13	50:20				
55:22	56:11				
58:6	58:13				
58:23	58:24				
60:22	61:3				
65:11	65:23	402			
67:2	67:5	106. Should start with 66:25	66:25 67:06	67:01 67:07	
67:8	67:18				
69:25	70:3				
72:8	72:10				
72:15	72:15				
78:18	79:3				
79:13	79:14				
79:23	80:12				
81:14	81:18				
81:23	81:23				
84:2	84:19	402; 403			
91:4	91:12	402; 403			

**Guo Wengui (continued)**

August 2, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
92:18	93:19	402; 403			
97:13	97:21				
99:20	99:21				
99:23	99:25				
101:20	101:21				
101:24	102:4				
102:20	104:3				
107:4	107:6				
109:16	109:18				
110:2	110:4				
110:24	111:7				
114:9	114:12	402; 403			
114:18	115:5	402; 403			
115:8	115:22	402; 403			
118:15	119:8	402; 403			
122:5	122:6	402; 403			
122:9	122:9	402; 403			
122:16	123:2				
128:13	128:15	402; 403			
129:13	129:18				
130:2	130:4	402; 403			

**Guo Wengui (continued)**

August 2, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
131:20	132:15	Highlights don't match designations; we are ok with the designations recorded here but not the highlights			
149:21	149:23	402			
150:3	150:3	402			
150:7	150:8	402			
150:10	151:5	402			
158:5	158:19	402 as to 158:5 – 158:15			
160:12	160:15	402			
160:18	160:23	402			
163:4	163:10	402; 106	163:11	164:04	
164:5	164:10	402; 403			
164:14	164:14	402			
175:2	175:4	402			
175:8	175:8	402			
175:10	175:12	402			
175:15	175:19	402			
175:23	175:23	402			
176:8	176:13	402			
176:17	177:2	402			
177:5	177:5	402			
177:7	177:9	402			
177:15	177:15	402			
177:17	177:20	402			

**Guo Wengui (continued)**  
August 2, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
178:5	179:14				
182:13	183:4	As to 182:24-183:6, object to form and 402			
183:6	183:6	As to 182:24-183:6, object to form and 402, 403			
184:15	184:25				
187:5	187:8	402; 403			
187:11	187:17	402; 403; 106	187:18	187:24	
189:4	189:5	Object to form and 402, 403			
189:8	189:8	Object to form and 402, 403			
191:16	191:22	402; 403			
195:23	196:5	402; 403			
196:9	196:13	402; 403			
196:17	197:2	402; 403			
197:5	197:10	402; 403			
197:18	197:24	402; 403			
198:12	198:14	402; 403			
204:15	204:21				
205:2	205:5				
205:19	205:20				
205:23	205:23				
206:25	207:9				
207:11	208:19				

**Guo Wengui (continued)**  
August 2, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u><b>Beginning</b></u>	<u><b>Ending</b></u>		<u><b>Beginning</b></u>	<u><b>Ending</b></u>	
211:4	211:9		210:13	211:3	Hearsay in violation of Rule 801-02 and no exception applies. Further, the testimony is irrelevant because it is not responsive to the question, which asked about the creation of circumstances causing subjects to engage defensive measures after becoming aware they were being researched. The question did not address the legality of any activities undertaken to research. The testimony is misleading and creates confusion of issues.
213:12	213:14	106	213:06	213:11	
213:17	214:6	402 as to 214:4 – 214:6			
214:11	214:11	402; 403			
214:13	214:18	402; 403			
214:24	215:3	402; 403			
215:5	215:5	402; 403			
215:7	215:18	402 and 403 as to 215:7 – 215:9			
218:7	218:10	402			
219:4	219:16	402			
219:19	219:20	402			

**Karin Maistrello**

August 23, 2019

Strategic Designations		Eastern Objections	Eastern Counter-Designations		Strategic Objections to Eastern Counter-Designations
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
8:24	8:25				
10:22	11:10				
12:7	12:16				
12:19	12:21	402; 403; 801/802			
12:25	13:10	402; 403; 801/802			
13:14	14:20	402; 403; 801/802			
14:25	14:25	402; 403; 801/802			
27:1	27:23	402; 403; 801/802			
27:25	28:16	402; 403; 801/802			
28:19	28:23	402; 403; 801/802			
29:1	29:19	402; 403; 801/802			
29:22	30:21	402; 403; 801/802			
30:24	31:11	402; 403; 801/802			
31:14	31:21	402; 403; 801/802			
31:25	32:24	402; 403; 801/802			
33:3	34:3	402; 403			
34:7	34:21	402; 403			
35:20	35:25	402; 403			
36:21	37:9	402; 403			
37:12	37:21	402; 403			
37:25	38:1	402; 403			

**Karin Maistrello (continued)**

August 23, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
38:4	38:21	402; 403			
38:25	39:3	402; 403			
39:7	39:17	402; 403			
39:20	39:25	402; 403			
40:3	40:25	402; 403			
41:5	41:8	402; 403			
41:10	41:10	402; 403			
41:13	41:21	402; 403			
41:24	42:22	402; 403; 801/802			
42:25	43:6	402; 403			
43:8	43:8	402; 403			
43:10	43:25	402; 403			
44:18	46:8	402; 403			
47:12	47:16	402; 403			
47:19	47:19	402; 403			
48:21	49:9	402; 403			
49:12	49:14	402; 403			
49:17	49:23	402; 403			
49:25	49:25	402; 403			
50:2	50:2	402; 403			
50:22	51:15	402; 403			



**Karin Maistrello (continued)**

August 23, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
51:18	52:6	402; 403			
52:10	52:11	402; 403			
52:19	53:7	402; 403			
53:9	53:11				
53:14	53:16				
53:24	54:8				
54:11	55:2				
55:21	56:1	402; 403			
56:3	56:6	402; 403			
56:9	56:15	402; 403			
56:18	57:4	402; 403			
57:7	57:9	402; 403			
57:12	57:24	402; 403			
58:1	58:1	402; 403			
58:7	58:9	402; 403			
58:21	59:15	402; 403			
59:17	59:24	402; 403			
60:2	60:5	402; 403			
60:8	60:21	402; 403			
60:24	60:24	402; 403			
61:5	61:7	402; 403			
61:15	61:17	402; 403			

**Karin Maistrello (continued)**

August 23, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
63:8	63:17	402; 403			
63:20	63:22	402; 403			
63:25	64:2	402; 403			
64:5	64:5	402; 403			
64:19	64:21	402; 403			
64:23	64:24	402; 403			
65:1	65:7	402; 403			
68:15	68:20	402; 403			
70:6	70:23				
71:17	71:19	402; 403			
71:22	71:25	402; 403			
72:23	72:25	402; 403			
73:3	73:6	402; 403			
73:13	73:14	402; 403			
73:17	73:19	402; 403			
80:10	80:13	402; 403			
80:23	81:2	402; 403			
81:8	81:12	402; 403			
81:15	81:17	402; 403			
89:1	89:3	402; 403			
89:6	89:6	402; 403			

**Karin Maistrello (continued)**

August 23, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
89:23	90:19				
90:22	91:1				
91:5	91:14				
94:7	94:14				
94:16	95:02				
95:4	95:8	402; 403			
95:10	95:12	402; 403			
95:14	95:14	402; 403			
96:7	96:11	402; 403			
96:20	97:4	402; 403			
97:24	98:1	402; 403			
98:18	99:4	402; 403			
99:8	99:8	402; 403			
102:23	102:25	402; 403			
103:3	103:4	402; 403			
103:7	103:7	402; 403			

**Lianchao Han**  
August 28, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
8: 2	8: 7				
9:8	11:18				
11:22	12:6				
12:9	12:22				
13:5	13:17				
13:19	13:19				
14:4	14:20				
16:10	18:16				
19:9	20:1	106	20:02	20:05	
20:8	21:9	402; 403; 801/802			
21:22	22:3	402; 403; 801/802; 106	22:04	22:11	Hearsay without an applicable exception in violation of Rule 801-02, irrelevant—the hacking incident regarding the Clark Hill firm is not relevant to the issues in the case. The testimony presents Guo in a sympathetic light and therefore is prejudicial to Strategic. The subject can only create confusion for the trier of fact.
22:12	23:4				
23:17	24:18	801/802; Form			
24:21	25:9	801/802			
26:4	27:11				
28:6	28:10				
28:12	29:3				
29:16	31:12				
31:15	32:13				
32:15	32:17				

32:19	33:19	106	33:20	34:05	The witness does not fully answer the question in that he indicates he “understands” Guo’s position but does not fully define that position. The witness does not then indicate whether the position concerns the witness, even if the witness understands it. The witness bases his testimony on inadmissible hearsay without an applicable exception. The testimony is incomplete, and will create confusion for the trier of fact.
-------	-------	-----	-------	-------	---

**Lianchao Han (continued)**

August 28, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
34:13	34:14				
34:17	34:22				
35:3	35:5	106	35:07	35:07	
35:10	35:11				
35:14	35:18				
36:11	36:22				
37:3	37:15				
37:18	38:2	402; 403 as to 37:21-38:02			
38:20	39:11				
39:21	40:1				
40:3	40:15	106	40:16 40:21 41:16 42:04	40:18 41:13 42:01 42:06	The witness speculates about what was in the mind of Gertz. At the time, the witness was not involved in preparing a communication or public relations plan for Guo, and the witness lacks personal knowledge of what communications Gertz may have had with Waller and Wallop.
42:8	42:15				
43:1	43:2				
43:4	43:9				
43:11	44:11	106	44:12	44:16	
44:17	45:5				
45:8	46:2				
46:17	47:4				
47:7	47:9	106	49:13	49:19	
53:13	53:15				
53:18	54:7				

Strategic Designations		Eastern Objections	Eastern Counter-Designations		Strategic Objections to Eastern Counter-Designations
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
54:9	54:16				
55:13	56:6	106	56:07 56:19 57:03 65:02 69:05 70:01	56:16 57:01 57:14 65:22 69:09 70:15	56:7-57:11: the witness admits he lacks personal knowledge of Guo's attribution of the Hudson Institute incident to evidence the CCP was persecuting Guo, and the testimony indicates lack of personal knowledge on the subject in general. The testimony is irrelevant and immaterial. The subject of the Hudson event has no probative value in the case. 65:2-22 is based on hearsay without an applicable exception. Other than a newspaper article that is not introduced at the deposition, and for which few details are given by the witness, the witness bases his answer on what Guo told him. The witness lacks personal knowledge and bases his testimony on inadmissible hearsay. 69:5-9: the witness admits he is without personal knowledge about the CCP detaining Guo at a particular period of time. 70:1-15: the witness lacks personal knowledge of the practices of the Chinese communist regime, particularly in more recent years. The witness appears to rely on what other, named activists have told him. The testimony lacks foundation and will be confusing to the trier of fact.
64:15	64:18	402; 403			

64:22	64:22	402; 403			
70:16	17:18	Typo. Should be 71:18			
70:20	70:20				
71:5	71:7				
71:16	71:17				
71:19	71:19	106	71:21 72:14	72:03 73:05	The witness speculates regarding the motives and availability of business transactions in mainland China; there is a lack of foundation; the witness testified that he has been living in the U.S. for decades (9:17-22), his career is not in business transactions like that described here (10:4-11:14), the example was not taking money from China but investing in China; the foundation was not laid for how the witness has a sufficient base of knowledge to address the subject matter. The witness bases his testimony on inadmissible hearsay.
73:10	71:11	Typo. Should be 73:11.			
73:13	73:13				
73:15	73:17	106	73:21	74:08	The testimony is inadmissible hearsay. The testimony is confusing and nonresponsive. The witness testified that it would not surprise him if Guo spoke publicly in support of President Xi and then explains the answer by testifying that, in private, Guo said the opposite, and that testimony goes beyond Xi to the entire Communist Party.
74:9	74:22				
77:6	77:19				
77:21	77:21	106	78:01 78:07 78:10 78:14 78:20	78:03 78:08 78:12 78:17 78:22	



79:1	79:2				
79:5	79:9				
79:12	79:16				
79:18	79:22				
80:3	80:5	106	80:6 80:18 80:22 81:06 81:19	80:10 80:19 81:03 81:16 83:03	80:18: the testimony is based on speculation, as evidenced by the witness's statement "[t]hat's just my understanding..." The witness does not base his answer on any expressed source other than himself, even though the witness purports to describe Guo's state of mind as having more import than his spoken words ("What he said ... is not what he really intended to say"). What the witness says, in essence, is that Guo misspoke.  81:19 (beginning with): the designated testimony includes counsel discussion, including an instance of a counsel (D. Podhaskie) purporting to testify for the witness. This is prejudicial, improper, and confusing to the trier of fact in violation of Rules 401-03 and 611. The portion also references a non-party and is irrelevant.

**Lianchao Han (continued)**

August 28, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
83:5	83:8	106			83:16: the witness lacks personal knowledge to identify the intentions of the Chinese Communist Party, particularly in relation to use of the U.S. legal system. The testimony is based on speculation. The question posed sought a yes-or-no answer and the witness's testimony at 83:19-84:1 was nonresponsive.
			83:09	83:11	
			83:14	83:17	84:3-7 was withdrawn by the examiner and does not contain relevant information.
			83:19	84:10	
			84:13	84:16	84:8-16: the witness admits a lack of personal knowledge and that he is
			93:07	93:09	speculating ("I'm not sure." "I think"). The
			93:12	93:17	speculation includes discussing the financial
			94:01	94:03	circumstances of the unknown litigants
			94:06	94:09	described by the witness.
			94:18	94:19	
			94:22	95:06	
			97:04	97:07	93:12-94:9: in violation of Rule 602, the
			97:11	97:21	witness speculates about a purported change
			98:05	98:16	in the Chinese government's viewpoint on
					Guo following an alleged interaction
					between the FBI and the Chinese
					government officials who visited Guo in
					2017. The witness did not know Guo at the
					time, and the witness's testimony is based on
					inadmissible hearsay. The witness bases his
					testimony on the idea that the Chinese
					government has never again met with Guo in

					<p>New York but that is based on speculation, as the witness admits (“just on my knowledge”).</p> <p>97:4-98:16: the testimony is based on inadmissible hearsay in violation of Rules 801-02. The witness describes the information he received about the trip as skeletal—only that Wang Qishan did all the talking at the meeting. The witness does not directly answer the question regarding what the purpose of the trip was.</p>
99:14	102:9	801; 802; 701			
102:12	103:6	801; 802; 701			
103:9	103:20	801; 802; 701			
104:1	104:2	801; 802; 701			
105:20	106:17	801; 802; 701			
106:20	109:11	801; 802; 701			
109:14	109:14	801; 802; 701			
109:17	110:14	801; 802; 701			
110:17	111:15	801; 802; 701			
111:17	113:8	801; 802; 701			
113:10	113:21	801; 802; 701			
114:1	118:10	801; 802; 701			
118:13	119:18	801; 802; 701; 106	120:14 120:19	120:16 120:19	
120:21	121:1				
121:4	121:5				
122:13	123:8				
123:11	123:13				
124:10	124:16				
124:19	125:4				
126:19	128:22				

**Lianchao Han (continued)**

August 28, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
130:14	132:7				
132:10	133:2				
133:22	134:7	402; 403; Facts Not in Evidence			
136:6	136:12				
136:14	136:14				
137:20	138:15				
138:17	140:1				
140:4	140:9				
140:11	140:14				
141:2	141:4				
141:17	141:20				
142:4	142:13				
142:16	142:17				
142:20	143:6				
146:14	148:2				
149:12	149:16				
149:21	150:2				
150:14	150:16				
151:7	151:9				
152:10	152:13				
154:21	155:1				

**Lianchao Han (continued)**  
August 28, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u><b>Beginning</b></u>	<u><b>Ending</b></u>		<u><b>Beginning</b></u>	<u><b>Ending</b></u>	
156:20	157:14	106	223:09 223:13	223:10 224:08	<p>223:09 and on: the witness testified that he was not aware of the final terms of the contract, which were negotiated by Wang (and she then signed the contract). In the end, the witness admits he does not know whether the deposit under the contract was refundable. The entire portion has no value to the trier of fact in violation of Rule 403.</p> <p>223:13 and on: in violation of Rule 602, the witness admits his testimony is based only on a “rough idea” and he speaks about which he is only “pretty sure,” thus showing there is an insufficient foundation for the testimony. The witness then uses the pejorative term “junk information,” which is prejudicial to Strategic in violation of Rule 403.</p>
158:3	158:5	106	223:09 223:13	223:10 224:08	<p>223:13 and on: in violation of Rule 602, the witness admits his testimony is based only on a “rough idea” and he speaks about which he is only “pretty sure,” thus showing there is an insufficient foundation for the testimony. The witness then uses the pejorative term “junk information,” which is prejudicial to Strategic in violation of Rule 403.</p>

158:14	159:14				
160:10	160:21				
161:1	161:11				
161:13	161:18				
161:20	162:9				
163:10	163:13				
163:16	166:4				
166:6	166:6				
167:21	168:1				
168:3	168:14				
168:16	169:18				
172:3	172:12				
172:16	172:21				
173:1	173:9				
173:12	174:13				
174:15	175:10				
175:15	176:6				
179:2	179:5				
179:8	179:10				

**Lianchao Han (continued)**

August 28, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
179:13	179:13	106	179:15 179:20	179:17 180:05	
180:12	180:14				
180:17	181:3				
181:5	181:5				
181:7	181:7				
181:9	181:11				
181:22	182:5				
182:8	182:13	106	182:15 182:19	182:16 182:22	Rule 602: foundation does not exist for this witness to opine about the corporate structure and organizational authority of ACA. The testimony is based on a lack of personal knowledge.
183:2	183:4				
183:7	183:9				
183:16	183:16				
183:20	183:21				
184:2	184:9				
185:2	185:4				
185:7	185:7				
185:19	185:21				
188:14	188:17				
189:9	192:3				
192:6	192:17				
192:20	192:22				
195:2	196:14	602; 801/802			

**Lianchao Han (continued)**

August 28, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
197:18	200:3				
200:11	200:12				
200:15	200:20				
205:4	207:14	106	223:09 223:13	223:10 224:08	<p>223:09 and on: the witness testified that he was not aware of the final terms of the contract, which were negotiated by Wang (and she then signed the contract). In the end, the witness admits he does not know whether the deposit under the contract was refundable. The entire portion has no value to the trier of fact in violation of Rule 403.</p> <p>223:13 and on: in violation of Rule 602, the witness admits his testimony is based only on a “rough idea” and he speaks about which he is only “pretty sure,” thus showing there is an insufficient foundation for the testimony. The witness then uses the pejorative term “junk information,” which is prejudicial to Strategic in violation of Rule 403.</p>
209:9	210:12	106	223:09 223:13	223:10 224:08	<p>223:09 and on: the witness testified that he was not aware of the final terms of the contract, which were negotiated by Wang (and she then signed the contract). In the end, the witness admits he does not know whether the deposit under the contract was</p>



					<p>refundable. The entire portion has no value to the trier of fact in violation of Rule 403.</p> <p>223:13 and on: in violation of Rule 602, the witness admits his testimony is based only on a “rough idea” and he speaks about which he is only “pretty sure,” thus showing there is an insufficient foundation for the testimony. The witness then uses the pejorative term “junk information,” which is prejudicial to Strategic in violation of Rule 403</p>
210:16	211:8				
211:11	212:7				
212:10	212:12				
212:15	212:15				
213:7	213:12				
214:16	215:2				
215:5	215:5				
215:13	215:16				
215:19	215:19	106	215:21 216:03	215:22 216:06	
217:22	218:15				
218:18	218:18	106	219:04 219:09	219:06 219:10	
222:7	222:20				
222:22	223:8	106	223:09 223:13 224:18	223:10 224:15 224:21	<p>223:13 and on: in violation of Rule 602, the witness admits his testimony is based only on a “rough idea” and he speaks about which he is only “pretty sure,” thus showing there is an insufficient foundation for the testimony. The witness then uses the pejorative term “junk information,” which is prejudicial to Strategic in violation of Rule 403.</p>

225:1	225:6				
225:9	225:14				
226:10	226:11				

**Lianchao Han (continued)**

August 28, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
226:14	227:5				
227:8	227:14	106	227:15 228:12 228:17	228:03 228:14 229:01	228:12 on: the witness admits he doesn't "specifically remember" and only "maybe" recalls seeing the information. Despite this lack of personal knowledge in violation of Rule 602, the witness opines that the presentation was "all junk, full of junk." This pejorative description is prejudicial to Strategic and based on speculative testimony from a witness who does not clearly remember.
230:9	230:17				
231:6	231:8	602; 801/802			
231:11	231:11	602; 801/802			
231:21	232:1	602; 801/802			
232:3	232:7	602; 801/802			
233:5	233:8	602; 801/802			
233:10	233:17	602; 801/802			
233:20	233:21	602; 801/802			
234:2	234:2	602; 801/802			
234:4	234:5	602; 801/802			
234:8	234:8	602; 801/802			
234:10	234:12	602; 801/802			
234:15	234:15	602; 801/802			
234:21	235:5	602; 801/802			
236:3	236:5				
236:8	236:17				
236:19	236:19				

236:21	236:22				
237:10	237:13				

**Lianchao Han (continued)**

August 28, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u><b>Beginning</b></u>	<u><b>Ending</b></u>		<u><b>Beginning</b></u>	<u><b>Ending</b></u>	
237:16	238:3				
238:6	238:6				
238:15	238:17	602; 801/802			
238:19	239:9	602; 801/802			
239:11	239:12	602; 801/802			
239:14	241:5	602; 801/802			
245:5	245:22	402; 403			
246:3	246:17	402; 403			
248:4	248:11	402; 403			
248:15	248:19				
249:22	249:9				
249:12	250:9				
252:4	252:6	402; 403			
252:9	252:9	402; 403			
252:11	253:5	402; 403			
252:8	252:9	402; 403			
252:16	252:22	402; 403; 106	254:01 254:05	254:02 254:07	In violation of Rule 602, the witness speculates that Wang is still a member of the CCP but in exile. The witness does not have personal knowledge of this subject, as he admits “I don’t know.”
256:5	256:11				
256:14	256:16	106	264:19 265:01	264:21 265:20	In violation of Rule 403, this testimony is unduly prejudicial to Strategic because the witness implies that Strategic engaged in improper activity by implying that it would pay Lianchao an introduction fee and thereby place the witness in Strategic’s

					“pocket” concerning its performance of the Research Agreement. In violation of Rule 602, the testimony is based on speculation and a lack of concrete personal knowledge, as shown by the witness’s use of the term “might” and “might have.” The witness then repeatedly answers with “maybe.” Similarly, the witness states that the supposed offer was “implied.” The testimony reflects inadmissible hearsay.
256:19	257:15				
264:9	264:18				

**Lianchao Han (continued)**

August 28, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
266:9	267:5				
267:7	267:16				
267:18	273:20	106	274:10 275:10	275:05 275:10	The entire passage should be stricken because as subject to counsel discussion and objection. The rephrased question and answer have been designated by both parties.
275:14	278:02	106	278:03 278:08	278:05 279:09	The witness was not designated to speak for Eastern Profit on this subject and lacks personal knowledge to be able to testify whether Eastern Profit accepted or rejected the information provided by Strategic under the Research Agreement. The testimony is not relevant and lacks foundation in violation of Rules 402, 602. Additionally, some portion of the indicated testimony was withdrawn by the examiner and rephrased. This should be excluded under Rules 402-03 and 611.
279:10	279:14	106	279:15	279:17	The witness was not designated to speak for Eastern Profit on this subject and lacks personal knowledge to be able to testify whether Eastern Profit accepted or rejected the information provided by Strategic under the Research Agreement or whether Strategic fulfilled its contractual obligations. The testimony is objectionable under Rules 402, 602.

283:11	283:14	106	283:15	284:15	The witness expresses a lay opinion regarding the activities and motivations of Chinese dissidents and non-dissidents. The testimony is based on speculation and lacks indicia of reliability, including because little detail is given regarding the group of unnamed individuals, their activities, the times in which dissident events happened. The basis of the testimony is hearsay. Rules 801-03 and 602 have been violated.
285:4	286:14	106	284:22	285:03	
287:5	287:7				
287:10	287:10				
287:12	287:16	106	288:09 289:04 293:10 293:17	288:15 290:01 293:12 293:22	The witness was not designated to speak for Eastern Profit on this subject and lacks personal knowledge to be able to testify whether Eastern Profit accepted or rejected the information provided by Strategic under the Research Agreement or whether Strategic fulfilled its contractual obligations. The testimony is objectionable under Rules 402, 602
290:2	290:9	402; 403			



**Bill Gertz**  
October 15, 2019

Strategic Designations		Eastern Objections	Eastern Counter-Designations		Strategic Objections to Eastern Counter-Designations
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
8:13	8:14				
10:12	11:18				
12:18	13:13				
17:2	18:16				
19:1	23:1				
23:19	23:21				
24:5	24:10				
25:18	27:2				
28:3	30:12				
31:5	31:17				
32:5	32:7				
33:16	34:7				
34:9	37:10				
37:18	37:19				
37:21	37:21				
38:19	39:21				
40:4	40:8				
41:15	44:13				
45:20	46:7				
46:15	47:6				
48:9	48:10	form			

**Bill Gertz (continued)**  
October 15, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
48:12	48:15	form			
48:17	51:20				
55:5	55:8	form			
55:10	56:2				
56:14	56:16				
57:9	57:19				
58:17	60:6				
60:16	60:20				
61:7	61:10				
61:19	65:18				
66:1	68:12				
68:14	69:10				
69:12	69:19				
69:21	71:8				
71:18	73:19				
74:13	76:19				
77:9	78:12				
78:14	79:6	106	79:10	79:19	This is improper opinion testimony from a witness who admits he did not investigate the background of Guo when Guo lived in China, and does not have knowledge to answer such important questions as why Guo left China (78:4-79:3). Lack of foundation and irrelevant testimony. Use of the testimony would misuse the trier of fact's time and attention.
80:3	80:8				
80:10	80:10				
81:16	82:5				

**Bill Gertz (continued)**

October 15, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
83:18	85:20				
86:3	86:14				
86:18	90:2				
90:9	90:14				
91:13	92:8				
94:14	94:16				
96:8	97:1				
98:8	98:18				
100:20	102:21				
103:9	103:10				
103:12	103:13				
105:11	106:1				
113:13	114:11				
115:20	116:3				
117:8	117:13				
126:5	134:9				
134:11	134:21				
135:15	136:9				
137:5	138:4				
139:20	141:17				
142:1	142:14				

**Bill Gertz (continued)**

October 15, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
144:1	144:3				
146:16	148:20	402; 403; 801/802	145:20 146:1	145:20 146:15	
149:17	154:10				
155:18	156:4		156:5	156:9	
156:10	156:13				
157:20	158:7				
158:11	158:15				
163:6	163:15	402; 403			
163:17	163:18				
163:20	163:21				
168:11	168:15				
168:17	169:7				
170:3	170:13				
178:6	178:14				
182:14	183:2				
183:4	185:3				
185:9	185:19				

**Yvette Wang**  
October 30, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
15:23	16:6				
16:23	17:3				
17:8	17:11				
22:10	22:12				
22:14	23:6				
23:22	24:22				
24:24	25:18				
25:20	27:2				
27:4	28:13				
29:8	29:18				
29:22	30:5				
31:4	32:24				
34:10	37:3				
37:6	38:8				
38:10	39:5				
39:7	39:9				
39:11	39:21				
39:24	39:25	This is only a question, no answer			
41:8	41:24				
42:4	42:9				
43:7	43:15				
44:2	44:17				

**Yvette Wang (continued)**

October 30, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
44:23	47:7				
47:9	47:12				
47:14	47:16				
47:19	47:25				
48:12	48:13				
48:15	48:21				
48:23	49:2				
49:7	49:21				
49:25	50:3				
50:5	50:20	106	51:22	53:01	<p>51:22-52:12 improperly includes an objection by counsel in violation of Rules 401-03 and 611. The witness does not answer the question asked, which was whether the witness had authority from Eastern Profit to be able to engage in discussions with William Je about repayment of the purported loan by ACA to Eastern. The witness does not answer the question. Citation to this will be misleading and create confusion of issues for the trier of fact.</p> <p>52:13-18: the indicated question is answered by the witness with a question, and there is no substantive answer given. Citation to this will be misleading and create confusion of issues for the trier of fact. No material evidence is given here.</p>
53:19	54:3				

54:24	55:21	106	55:22	56:06	The testimony is irrelevant and it will be wasteful of the trier of fact's time to hear it. The witness does not understand the first question asked
56:7	56:11				
57:5	57:9				
57:23	58:9				
58:11	58:11				
58:13	59:8				
59:12	59:16				
59:18	60:12				
63:9	63:21	402; 403; 801/802			
63:24	64:2	402; 403; 801/802			

**Yvette Wang (continued)**

October 30, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u><b>Beginning</b></u>	<u><b>Ending</b></u>		<u><b>Beginning</b></u>	<u><b>Ending</b></u>	
64:4	64:9	402; 403; 801/802			
64:11	64:16	402; 403; 801/802			
64:18	64:23	402; 403			
65:3	65:8	402; 403			
65:15	65:23	402; 403			
66:12	66:14	402; 403			
66:17	67:4	402; 403			
67:15	67:17	402; 403			
67:25	68:9	402; 403			
70:22	71:2	402; 403			
71:19	72:17	402; 403			
73:20	74:21	402; 403			
76:12	76:18	402; 403			
77:18	77:19	402; 403			
77:21	78:18	402; 403			
82:12	82:14	402; 403			
82:21	83:9	402; 403			
84:15	85:2	402; 403			
85:4	85:6	402; 403			
85:8	85:10	402; 403			
85:17	85:18	402; 403			



**Yvette Wang (continued)**

October 30, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u><b>Beginning</b></u>	<u><b>Ending</b></u>		<u><b>Beginning</b></u>	<u><b>Ending</b></u>	
85:20	86:6	402; 403			
86:8	86:15	402; 403			
88:19	88:23	402; 403			
92:8	94:4				
94:21	94:22				
94:24	95:2				
95:5	95:8				
95:22	96:2				
96:4	96:19				
96:24	97:8				
97:12	97:13				
97:18	98:3				
98:10	98:17				
98:20	99:4				
99:7	99:24	402; 403			
100:10	100:24	402; 403			
101:15	101:23	402; 403			
102:6	102:8				
103:8	103:17				
104:5	104:6				
104:21	105:21				

**Yvette Wang (continued)**

October 30, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
105:23	106:11				
106:18	106:23				
106:25	107:5				
107:9	108:8				
108:10	109:2				
109:10	109:23				
110:17	110:19	form			
110:21	111:7	form			
111:9	111:13	form			
111:15	112:2				
113:21	114:2				
114:5	114:6				
114:11	115:3				
115:5	115:8				
115:14	115:25				
116:6	116:19				
118:10	118:13				
119:3	119:5				
119:7	120:3				
120:5	121:6				
121:8	121:8				

**Yvette Wang (continued)**  
October 30, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
121:17	122:2				
122:18	122:22				
122:24	123:6				
123:8	123:15				
125:11	125:25				
126:2	126:10				
126:13	128:6	106	129:06	129:12	
131:9	131:12				
131:24	132:2				
132:4	133:10				
134:15	134:18	106	134:19	134:23	The testimony is based on inadmissible hearsay in violation of Rules 801-02 and lacks personal knowledge—the witness did not herself review Eastern’s financial statements.
135:17	135:20				
135:24	136:11				
137:3	137:8				
137:23	138:8				
138:11	138:19				
139:19	140:3	402: 403			
140:15	141:18	402: 403			
141:20	142:24	402: 403			
143:3	143:13	402: 403 (as to 143:3-143:5)			
143:15	143:19				

**Yvette Wang (continued)**

October 30, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
143:22	144:4				
144:12	144:22				
145:18	145:19				
146:5	146:8				
146:20	147:6				
147:8	147:17				
147:22	147:25				
148:6	148:15				
148:18	149:16				
149:23	150:9				
154:10	155:5				
155:7	155:22				
155:24	156:13	106	156:22	157:10	The testimony is based on inadmissible hearsay in violation of Rules 801-02.
157:11	157:15				
157:17	158:25				
161:8	161:13				
161:15	162:7				
162:9	162:9				
166:7	167:21	106	164:15	166:06	
167:24	168:12				
169:19	170:20				

**Yvette Wang (continued)**  
October 30, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
170:22	171:7				
171:20	171:23				
171:25	171:25				
174:3	174:18				
174:22	175:8				
175:15	175:16				
176:5	176:16				
176:18	176:21				
177:3	177:6				
177:13	177:17				
178:7	178:9				
179:10	179:12				
179:25	180:12				
181:7	182:12				
183:2	183:4				
183:7	183:21				
184:3	184:18				
187:17	187:19				
187:22	188:2				
190:23	191:20				
192:16	192:22				

**Yvette Wang (continued)**  
October 30, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u><b>Beginning</b></u>	<u><b>Ending</b></u>		<u><b>Beginning</b></u>	<u><b>Ending</b></u>	
193:19	193:23				
194:2	194:10				
195:14	195:16				
195:18	196:7				
196:9	196:15				
197:18	197:21				
197:23	198:6				
202:2	202:4				
202:11	202:17				
203:2	204:18				
204:20	204:20				
205:21	206:2				
206:7	206:10				
206:13	207:2				
207:4	207:15				
207:18	208:14				
208:16	208:18				
208:21	208:22				
209:25	210:3				
210:5	210:5				
211:12	212:6				



**Chunguang Han**  
November 11, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
5:14	5:17				
7:2	7:5				
7:20	8:4				
8:16	8:17				
10:25	11:5				
12:7	13:16				
13:22	14:2				
17:21	18:3				
24:20	25:15	402; 403			
25:18	26:2	402; 403			
26:5	26:14	402; 403			
29:16	29:24	402; 403			
33:18	34:20	402; 403 (33:18-34:05)			
35:5	38:13				
38:18	39:17				
40:8	40:24				
41:4	41:7				
42:7	42:11	402; 403			
43:11	44:8				
44:14	45:8				
46:2	46:4				



**Chunguang Han (continued)**  
November 11, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
46:6	46:15				
46:17	46:23				
47:2	47:16				
49:23	51:3	402; 403			
51:8	52:2	402; 403			
52:4	53:12	402; 403			
53:20	55:16	402; 403			
55:19	55:23	402; 403			
55:25	56:14	402; 403			
57:17	57:23				
58:14	59:11				
59:14	59:17				
59:23	60:13				
60:17	60:22		60:23	61:10	The witness refuses to answer one of the designated questions (“I don’t want to answer it”) and citing the testimony violates Rule 403.
61:17	61:21	402; 403			
62:1	62:25	402; 403			
63:3	63:3	402; 403			
63:9	63:13	402; 403			
63:15	63:20	402; 403			
63:23	64:24	402; 403			
65:2	65:7	402; 403			

**Chunguang Han (continued)**  
November 11, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
66:21	66:22	402; 403			
66:24	67:4	402; 403			
67:7	67:18	402; 403			
67:21	68:8	402; 403			
69:15	69:16	402; 403			
69:18	69:19	402; 403			
69:21	70:17	402; 403			
70:20	70:22	402; 403			
71:6	71:20	402; 403			
71:22	72:13	402; 403			
72:22	73:2				
73:4	74:3				
74:15	74:20	402; 403			
74:23	75:2	402; 403			
75:20	76:5				
77:13	77:17	402; 403			
77:23	77:23	402; 403			
78:17	78:23	402; 403			
80:21	80:25	402; 403			
82:23	82:24	402; 403			
83:23	84:5	402; 403			

**Chunguang Han (continued)**  
November 11, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u><b>Beginning</b></u>	<u><b>Ending</b></u>		<u><b>Beginning</b></u>	<u><b>Ending</b></u>	
84:8	84:8	402; 403			
85:5	85:7				
85:9	85:22				
85:25	86:18				
86:21	87:5	402; 403			
87:9	87:13	C/O			
87:23	88:6	402; 403			
88:9	88:24				
89:3	89:9				
91:3	91:9	402; 403			
91:24	92:3				
92:7	93:3				
93:12	93:25				
100:24	101:6				
101:10	102:6	402; 403			
102:13	102:18	402; 403			
102:23	102:24	402; 403			
103:14	103:17	402; 403			
103:20	104:5	402; 403			
104:7	104:13	402; 403			
104:16	104:19	402; 403			

**Chunguang Han (continued)**  
November 11, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
104:24	105:3	402; 403			
106:2	107:3				
107:6	107:6				
107:16	107:24				
109:15	110:19				
111:2	111:10				
111:13	111:25				
112:8	112:16				
112:19	112:25				
113:4	113:12				
113:15	113:15				
114:2	114:7				
114:10	114:12				
116:6	116:17				
116:20	116:25				
117:5	117:18				
117:20	118:24				
119:8	119:8				
119:15	119:22				
124:11	124:13				
124:17	125:5				

## Chunguang Han (continued)

Strategic Designations		Eastern Objections	Eastern Counter-Designations		Strategic Objections to Eastern Counter-Designations
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
125:7	125:10	106	125:11	126:02	There is no substantive information given here in violation of Rules 402, 403, including because it contains counsel objections and commentary.
126:3	126:8				
126:15	126:17				
126:20	126:23	106	126:24	127:08	
127:9	127:15	106	127:22	128:07	
129:16	130:6				
130:8	130:15				
131:19	132:7	106	132:08	132:23	The indicated testimony contains counsel objections in violation of Rules 401-02, 611. The testimony creates confusion because it is inconsistent with the witness's earlier testimony on the subject, in violation of Rule 403.
132:24	134:3	402; 403			
134:6	134:17				
134:20	135:14				
135:16	136:22				
136:25	136:25				
137:14	137:20				
138:5	138:10				
138:14	138:18				
138:24	139:3				
139:5	139:24				
140:12	141:8				
141:11	141:22				

141:24	142:8	106	142:09	142:18	
--------	-------	-----	--------	--------	--

November 11, 2019

### Chunguang Han (continued)

November 11, 2019

[illegible]

**Amelia Coluccio**  
November 12, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
7:12	7:19				
8:16	8:25				
9:2	9:11				
10:3	11:6				
13:4	13:14	402; 403			
15:20	16:24	402; 403			
18:17	18:25	402; 403			
19:20	20:6	402; 403			
22:14	22:19	402; 403			
22:25	23:2	402; 403			
23:12	23:15	402; 403			
23:24	24:3	402; 403			
24:9	24:21	402; 403			
25:6	25:8	402; 403			
25:23	25:24	402; 403			
26:3	26:3	402; 403			
31:25	32:5	402; 403			
33:7	33:19	402; 403			
48:2	48:22	402; 403			
48:25	49:2	402; 403			
49:5	49:7	402; 403			



## Amelia Coluccio (continued)

November 12, 2019

Strategic Designations		Eastern Objections	Eastern Counter-Designations		Strategic Objections to Eastern Counter-Designations
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
51:22	51:23	402; 403			
51:25	52:15	402; 403			
52:23	53:5	402; 403			
53:12	54:16				
54:20	55:23				
56:6	58:22				
59:2	59:2				
59:19	59:22				
60:13	60:15				
60:21	60:21				
61:22	62:22				
64:17	64:25				
65:17	65:22	402; 403			
66:1	66:5	402; 403			
66:17	66:25	402; 403			
67:7	67:25	402; 403			
70:9	70:21	402; 403			
71:8	71:10	402; 403			
74:18	75:2	402; 403			
75:9	76:8	402; 403			

## Amelia Coluccio (continued)

November 12, 2019

Strategic Designations		Eastern Objections	Eastern Counter-Designations		Strategic Objections to Eastern Counter-Designations
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
77:2	77:14	402; 403			
77:17	77:21	402; 403			
77:24	78:9	402; 403			
79:2	79:4	402; 403			
79:8	79:23	402; 403			
80:8	80:9	402; 403			
80:15	80:18	402; 403			
80:21	80:24	402; 403			
81:14	82:2				
83:7	83:19	402; 403			
83:23	84:2	402; 403			
84:24	85:3	402; 403			
85:7	85:7	402; 403			
85:13	85:22				
91:4	92:3				
92:25	93:6				
96:3	96:11				
96:19	96:23				
97:3	97:14				
99:3	99:5	402; 403			
99:10	99:21	402; 403			

**Amelia Coluccio (continued)**

November 12, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
102:23	103:14				
103:17	103:24				
105:2	105:5	402; 403			
105:9	105:9	402; 403			
105:21	106:6				
107:3	107:10	402; 403			
107:15	107:18	402; 403			
107:21	107:23	402; 403			
108:2	108:12	402; 403			
109:11	109:25	402; 403			
110:2	110:6	402; 403			
110:10	111:8	402; 403			
111:11	111:15	402; 403			
111:18	112:2	402; 403			
112:10	116:13	402; 403			
117:21	118:13	402; 403			
118:17	119:10	402; 403			
120:9	120:12	402; 403			
120:16	120:20	402; 403			
120:24	121:10	402; 403			
123:17	124:7	402; 403			
124:12	124:15	402; 403			

**Amelia Coluccio (continued)**

November 12, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
124:21	124:24	402; 403			
127:6	127:8	402; 403			
127:11	127:11	402; 403			
132:17	132:19				
132:23	133:4	402; 403			
134:9	134:10	402; 403			
134:14	134:19	402; 403			
135:7	135:9	402; 403			
135:13	135:14	402; 403			
140:14	140:18	402; 403			
140:21	141:8	402; 403			
143:23	144:2	402; 403			
144:5	144:13	402; 403			
144:17	145:8	402; 403			
145:13	145:25	402; 403			
147:2	147:17	402; 403			
147:20	148:2	402; 403			
148:6	148:14	402; 403			
151:14	151:16	402; 403			
151:20	151:22	402; 403			
152:2	152:11	402; 403			

**Amelia Coluccio (continued)**

November 12, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
152:14	152:18	402; 403			
152:21	152:24	402; 403			
153:4	153:7	402; 403			
153:11	153:11	402; 403			
154:4	154:7	402; 403			
154:11	155:8				
155:23	156:2	402; 403			
156:5	156:5	402; 403			
156:22	156:25	402; 403			
157:8	157:10	402; 403			
157:14	157:18	402; 403			
157:24	157:25	402; 403			
158:5	158:5	402; 403			
159:17	159:21	402; 403			
159:24	160:13	402; 403			
160:17	160:17	402; 403			
160:23	161:3	402; 403			
161:6	161:9	402; 403			
161:12	161:16	402; 403			
161:20	161:20	402; 403			
164:6	164:25	402; 403			

**Amelia Coluccio (continued)**

November 12, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
165:12	165:15	402; 403			
165:19	165:19	402; 403			
167:10	167:24	402; 403			
168:4	168:13	402; 403			
168:15	168:17	402; 403			
168:21	169:2	402; 403			
169:22	169:23	402; 403			
170:3	170:3	402; 403			
172:8	172:13	402; 403			
175:7	175:13	402; 403			
177:4	177:14	402; 403			
184:4	184:16	402; 403			
186:15	186:16	402; 403			
186:19	186:19	402; 403			

**Sasha Gong**  
November 26, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
7:15	7:21				
7:25	8:3				
9:11	16:12	602; 701; Expert (16:10-12)			
16:21	19:5	602; 701; Expert (16:21-17:04)			
19:19	21:18	602; 801/802 (21:18)			
21:22	22:13	602; 801/802			
22:18	23:10				
23:12	24:15	402; 403; C/O (24:10)			
25:8	27:23	402; 403; 602; 801/802			
29:20	30:19	602; 801/802; 1001-1004			
30:23	32:11	602; 801/802; 1001-1004			
32:16	32:25	602; 801/802; 1001-1004			
33:5	34:13	402; 403			
35:9	36:25	402; 403; 801/802 (36:13-22)			
37:4	37:15	402; 403; 801/802			
37:21	38:7	402; 403; 801/802			
38:13	38:25	402; 403; 602; 801/802			
39:12	40:15	402; 403; 602; 801/802	40:16	40:18	
41:2	41:20	402; 403			
42:1	42:10	402; 403			
42:12	43:11	402; 403			

**Sasha Gong (continued)**

November 26, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
46:4	46:13	402; 403; 801/802			
46:24	48:12	402; 403; 602; 801/802; 1001-1004	48:13	48:15	
48:16	49:13	402; 403; 602; 801/802; 1001-1004	49:14	49:20	
51:21	53:5				
54:23	55:23	402; 403; 602; 801/802; 1001-1004			
55:25	56:21	402; 403; 602; 801/802; 1001-1004	56:22	57:15	This violates Rules 401-03 and 611 because it contains a narrative objection-type statement of the non-examining attorney. The trier of fact will be confused by this unnecessary discussion in violation of Rule 403 especially.
58:21	59:12	402; 403; 602; 801/802; 1001-1004	59:14	59:24	This violates Rules 401-03 and 611 because it contains narrative objections by the non-examining attorney. The trier of fact will be confused by this unnecessary discussion in violation of Rule 403 especially.
60:8	60:10	402; 403; 602; 801/802; 1001-1004			
60:12	60:12	402; 403; 602; 801/802; 1001-1004			
60:23	63:24	402; 403; 602; 701; 801/802; 1001-1004; E	64:01	64:04	This violates Rules 401-03 and 611 because it contains narrative objections by the non-examining attorney. The trier of fact will be confused by this unnecessary discussion in violation of Rule 403 especially.
64:6	66:4	402; 403; 602; 701; 801/802; 1001-1004; E			
66:7	67:20	402; 403; 602; 701; 801/802; 1001-1004; E			
67:22	68:6	402; 403; 602; 701; 801/802; 1001-1004; E			



68:24	69:10	402; 403; 602; 701; 801/802; 1001-1004; E			
69:15	69:20	402; 403; 602; 701; 801/802; 1001-1004; E			
70:12	70:18	402; 403; 602; 701; 801/802; 1001-1004; E			
70:20	71:6	402; 403; 602; 701; 801/802; 1001-1004; E			
71:8	72:3	402; 403; 602; 701; 801/802; 1001-1004; E			
72:5	72:15	402; 403; 602; 701; 801/802; 1001-1004; E	72:19	73:09	In addition to containing an objection, the testimony has no probative value to the issues in the case, is based on hearsay, and will confuse the trier of fact. Rules 401-03, 611, 801-02
74:15	76:5	402; 403; 602; 701; 801/802; 1001-1004; E			
76:7	76:20	402; 403; 602; 701; 801/802; 1001-1004; E	76:21	77:13	The indicated portion does not contain a substantive, responsive answer to the question. It's inclusion will confuse the trier of fact and violates Rule 403. The testimony is based on hearsay in violation of Rules 801-02.

## Sasha Gong (continued)

Strategic Designations		Eastern Objections	Eastern Counter-Designations		Strategic Objections to Eastern Counter-Designations
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
77:14	78:8	402; 403; 602; 701; 801/802; 1001-1004; E			
78:18	80:7	402; 403; 602; 701; 801/802; 1001-1004; E			
81:1	81:14	402; 403; 602; 801/802; 1001-1004			
84:3	84:17	402; 403; 602; 801/802; 1001-1004	85:01	85:10	The indicated portion includes a counsel objection in violation of Rules 401-03 and 611. The question sought to determine whether the witness knew of how Guo financed his purchase of real estate. The witness did not know and lacked personal knowledge of the subject. Citation to the testimony will violate Rule 602.
85:20	86:3	402; 403; 602; 801/802; 1001-1004	86:03	90:17	The indicated portion includes a counsel objection in violation of Rules 401-03 and 611. The question sought to determine whether the witness knew of Guo business transactions. The witness did not know and lacked personal knowledge of the subject. Citation to the testimony will violate Rule 602.
92:16	93:12	402; 403; 602; 701; 801/802; 1001-1004; E			
93:16	94:16	402; 403; 602; 701; 801/802; 1001-1004; E			
94:18	95:6	402; 403; 602; 701; 801/802; 1001-1004; E			
95:8	95:15	402; 403; 602; 701; 801/802; 1001-1004; E	95:16	95:25	The indicated testimony shows a lack of personal knowledge of the subject, and there is no probative value to the testimony. Citation to the testimony will violate Rules 402, 403, 602.
96:1	96:10	402; 403; 602; 701; 801/802; 1001-1004; E			

97:11	98:23	402; 403; 801/802; 1001-1004			
99:8	99:19	402; 403			
99:22	99:24	402; 403			
100:1	100:5	402; 403			
100:19	102:11	402; 403; 801/802			
102:13	104:7	402; 403; 801/802			
104:10	104:13	402; 403; 602; 701; 801/802; 1001-1004; E			
104:15	105:25	402; 403; 602; 701; 801/802; 1001-1004; E			
109:4	109:23	402; 403; 602; 1001-1004			
114:10	114:15				
116:3	116:19	402; 403; 602; 801/802; 1001-1004			

**Sasha Gong (continued)**  
November 26, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
116:24	117:18	402; 403; 602; 701; 801/802; E			
117:21	118:5	402; 403; 602; 701; 801/802; E			
118:7	118:11	402; 403; 602; 701; 801/802; E			
119:6	119:15	402; 403; 602			
119:19	120:2	402; 403; 602			
120:5	121:3	402; 403; 602			
121:17	121:19	402; 403; 602; 701; 801/802; 1001-1004; E			
121:21	121:24	402; 403; 602; 701; 801/802; 1001-1004; E			
122:1	122:11	402; 403; 602; 701; 801/802; 1001-1004; E	122:12	123:25	Citation of this discussion between counsel, which includes statements of objection, is improper under Rules 401-03, 611. Nothing of probative value is included in the portion.
124:4	124:9	402; 403; 602; 701; 801/802; 1001-1004; E			
124:11	126:6	402; 403; 602; 701; 801/802; 1001-1004; E			
126:18	127:5	402; 403; 602			
127:8	128:4	402; 403; 602			
128:8	130:1	402; 403; 602			
130:9	130:13	402; 403; 602			
130:20	132:7	402; 403; 602; 701; 801/802; 1001-1004; E			
132:9	132:15	402; 403; 602; 701; 801/802; 1001-1004; E	132:16	132:22	
132:23	133:14				
134:2	135:16	402; 403; 801/802			
135:20	137:20	402; 403; 602; 701; 801/802; 1001-1004; E			
138:3	138:19	402; 403; 801/802			

**Sasha Gong (continued)**  
November 26, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
139:14	139:17	402; 403; 602; 701; 801/802; 1001-1004; E			
139:19	139:25	402; 403; 602; 701; 801/802; 1001-1004; E			
140:4	140:5	402; 403; 602; 701; 801/802; 1001-1004; E			
140:7	140:16	402; 403; 602; 701; 801/802; 1001-1004; E			
140:18	140:25	402; 403; 602; 701; 801/802; 1001-1004; E			
141:2	142:14	402; 403; 602; 701; 801/802; 1001-1004; E			
142:22	143:1	402; 403; 602; 701; 801/802; 1001-1004; E			
143:3	147:5	402; 403; 602; 701; 801/802; 1001-1004; E			
147:7	148:16	402; 403; 602; 701; 801/802; 1001-1004; E			
148:21	149:18	402; 403; 602; 701; 801/802; 1001-1004; E			
149:20	151:8	402; 403; 602; 701; 801/802; 1001-1004; E			
151:10	151:14	402; 403; 602; 701; 801/802; 1001-1004; E			
151:16	153:4	402; 403; 602; 701; 801/802; 1001-1004; E			
157:13	157:16	402; 403; 602; 701; 801/802; 1001-1004; E			
157:18	157:20	402; 403; 602; 701; 801/802; 1001-1004; E			
158:9	158:12	402; 403; 602; 701; 801/802; 1001-1004; E			
158:15	158:18	402; 403; 602; 701; 801/802; 1001-1004; E	158:19	158:25	Portions of the segment include an objection by counsel in violation of Rules 401-03, 611.
159:1	159:4	402; 403; 602; 701; 801/802; 1001-1004; E			
159:6	159:9	402; 403; 602; 701; 801/802; 1001-1004; E			
159:16	162:2	402; 403; 602; 701; 801/802; 1001-1004; E			
162:8	162:18	402; 403; 602; 701; 801/802; 1001-1004; E			

## Sasha Gong (continued)

Strategic Designations		Eastern Objections	Eastern Counter-Designations		Strategic Objections to Eastern Counter-Designations
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
163:20	163:24	402; 403; 602; 701; 801/802; 1001-1004; E			
164:13	165:6	402; 403; 602; 701; 801/802; 1001-1004; E			
165:12	165:21	402; 403; 602; 701; 801/802; 1001-1004; E			
165:23	166:2	402; 403; 602; 701; 801/802; 1001-1004; E			
166:5	166:7	402; 403; 602; 701; 801/802; 1001-1004; E			
166:11	166:15	402; 403; 602; 701; 801/802; 1001-1004; E			
166:20	166:22	402; 403; 602; 701; 801/802; 1001-1004; E			
166:24	166:25	402; 403; 602; 701; 801/802; 1001-1004; E	168:17	169:13	Much of the indicated testimony was not responsive to the question, which was limited to a discrete subject. The segment offers nothing of probative value and has a tendency to confuse the trier of fact. Rules 402-03 are invoked. The testimony includes an objection by counsel.
169:14	170:10	402; 403; 602; 701; 801/802; 1001-1004; E			
170:16	171:2	402; 403; 602; 701; 801/802; 1001-1004; E			
171:10	174:21				
175:10	177:1	402; 403; 602; 701; 801/802; 1001-1004; E	177:02	177:07	Much of the indicated testimony was not responsive to the question, which was limited to a discrete subject. The segment offers nothing of probative value and has a tendency to confuse the trier of fact. Rules 402-03 are invoked. .
177:8	178:15	402; 403; 602	178:16	186:21	Much of the indicated testimony was not responsive to the question, which was limited to a discrete subject. The segment offers nothing of probative value and has a

					tendency to confuse the trier of fact. Rules 402-03 are invoked. Not objecting to affirmative designations
180:8	183:23				
183:25	185:24		185:25	186:21	Objection above.
186:22	186:23				
186:25	187:4		193:16	194:01	Testimony about a group of unnamed people is not probative and the testimony does not address the issues in the case. The testimony is based on inadmissible hearsay.
195:19	195:22	402; 403; 602			
196:6	196:13	402; 403; 602			
196:15	197:9	402; 403; 602	197:10	198:20	The testimony is based in part on inadmissible hearsay in violation of Rules 801-02.
200:14	201:21	402; 403; 602			

November 26, 2019

**Sasha Gong (continued)**

November 26, 2019

[illegible]



**Guo Wengui**  
December 4, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<u>Beginning</u>	<u>Ending</u>		<u>Beginning</u>	<u>Ending</u>	
240:6	240:8	402; 403			
242:21	243:2				
251:7	251:24				
252:25	253:3				
253:7	253:12				
253:15	253:15				
267:4	267:7				
267:14	267:20	106	261:10	263:23	
268:9	268:11				
268:20	268:25				
269:8	269:16				
269:19	270:3				
270:9	270:10				
270:13	270:16				
271:2	271:7				
271:10	271:17				
271:20	272:13				
272:16	272:19				
272:23	272:24				
273:3	273:4				
274:19	274:22				

**Guo Wengui (continued)**

December 4, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
274:24	275:2	106	275:03	275:11	
276:18	276:23				
279:7	279:13				
279:20	280:2				
280:8	281:6				
281:9	281:11				
283:11	284:3				
284:23	285:10				
286:2	286:11				
286:14	286:19				
286:22	286:23	106	287:09	287:16	
288:2	288:11				
288:14	289:3				
292:5	294:2				
294:25	295:4				
295:16	295:18				
295:21	296:4				
296:7	296:16				
297:15	297:25				
298:4	298:22				
299:12	300:7				

**Guo Wengui (continued)**  
December 4, 2019

<b>Strategic Designations</b>		<b>Eastern Objections</b>	<b>Eastern Counter-Designations</b>		<b>Strategic Objections to Eastern Counter-Designations</b>
<b><u>Beginning</u></b>	<b><u>Ending</u></b>		<b><u>Beginning</u></b>	<b><u>Ending</u></b>	
300:16	301:6				
302:8	302:9				
302:13	302:18				
302:21	302:23				
303:2	303:3				
303:6	303:7				
303:10	303:11				
303:14	303:17				
303:20	303:21				
307:2	308:3				
308:10	308:11				
308:15	308:15				
309:24	310:5				
310:18	310:23				
311:17	311:21				
312:8	312:8				
313:10	313:11				
314:11	314:14				
314:23	314:25				
315:7	315:9				
317:20	317:22				

**Guo Wengui (continued)**

December 4, 2019

[illegible]